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November 11, 2018

*Ex Parte*

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re: Transforming the 2.5 GHz Band, WT Docket No. 18-120  
Notice of Oral Ex Parte Communication**

Dear Ms. Dortch:

On November 6, 2018, Nicole Tupman and the undersigned of Midcontinent Communications (Midco) met with Will Adams from Commissioner Carr's office. Midco discussed the above-referenced proceeding, and Midco's experience with fixed wireless and desire to use the 2.5 GHz band to serve rural America and bridge the Digital Divide.

Midco shared its views on the 2.5 GHz band as summarized in the enclosed presentation and maps, including the following: incumbent licenses should be rationalized from the current 35-mile radius government service areas (GSA) to county-sized licenses if the GSA covers at least 75% of the county; rationalization should be automatic and occur before a commercial auction; and the Commission should create auction procedures to encourage rural broadband buildout.

In accordance with Section 1.1206(b) of the Commission's rules, I have filed a copy of this notice electronically in the above-referenced docket. Please address any questions regarding the foregoing to me.

Sincerely,

/s/ Scott Anderson

Scott Anderson  
Chief Legal Officer  
Midcontinent Communications

Enclosures  
cc: Will Adams